# Pine Belt Telephone Company, Inc.

3984 County Rd. 32 - P.O. Box 279 Arlington, Alabama 36722 Phone (334) 385-2106

#### EB 06-36 EB-06-TC-060

## **CERTIFICATION OF CPNI FILING FEBRUARY 6, 2006**

February 6, 2006

#### VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12<sup>th</sup> Street S.W.
Washington, D.C. 20554

Dear Secretary Dortch:

cc:

In accordance with the Public Notice issued by the Enforcement Bureau on January 30, 2006, as revised by Public Notice issued on February 2, 2006, please find attached our company's submission in response to the Enforcement Bureau's request for the most recent period citing the requirements of § 64.2009(e) of the Commission's Rules.

Should you have any questions regarding this filing, please direct them to the undersigned.

Sincerely,

Pine Belt Telephone Company, Inc.

John C. Nettles President/CEO

Byron McCoy via e-mail byron.mccoy@fcc.gov Best Copy and Printing, Inc., via e-mail fcc@bcpiweb.com

# Before the Federal Communications Commission Washington, D.C. 20554

## Certification of CPNI FILING FEBRUARY 6, 2006 OF PINE BELT TELEPHONE COMPANY, INC.

#### EB-06-TC-060 EB Docket No. 06-36

TO: FEDERAL COMMUNICATIONS COMMISSION, ENFORCEMENT BUREAU

In response to the Commission's Public Notice, DA 06-223 (released January 30, 2006), and revised by Public Notice, DA 06-258 (released February 2, 2006), Pine Belt Telephone Company, Inc. ("Pine Belt") states as follows:

- 1. I am an officer of Pine Belt and this certificate is based on my personal knowledge.
- 2. As a small rural carrier with less than three thousand (3,000) access lines, Pine Belt implemented the following measures to comply with the FCC rules contained in the subpart addressing CPNI for 2005:
  - (a) With the exception of the incident listed in (b) below Pine Belt did not use CPNI for sales and marketing campaigns in 2005;
  - (b) On September 27, 2005, Pine Belt undertook to notify its customers of their eligibility to receive DSL services. Pine Belt did this by sending a directed mailing to only those customers with qualified local loops. This CPNI use did not violate the opt-out database of the Company.

- (c) Pine Belt did not turn over CPNI to any third parties in 2005;
- (d) Pine Belt does not tolerate the improper use of CPNI by employees with violations subject to the normal disciplinary process of Pine Belt;
- (e) Pine Belt has records of how it used CPNI as described in (b) above in 2005;
- (f) As referenced in (c) above CNPI was not disclosed to third parties in 2005, however, in the event that Pine Belt later seeks to utilize, disclose or permit CPNI access and that includes disclosure to third parties, Pine Belt will maintain a record of all instances where CPNI is disclosed or provided to third parties in the future, or where third parties are allowed access to CPNI. Such record will include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. This record shall be retained for a minimum of one year.
- (g) Pine Belt sales personnel are required to obtain supervisory approval of any proposed outbound marketing campaign.
- 3. Pine Belt is unaware of any instances where its opt-out mechanisms did not work properly in 2005, however, it will provide written notice within five business days to the Commission of any future instance where the opt-out mechanisms do not work properly, except when such incident is isolated and an anomaly.
- 4. Pine Belt plans to adopt additional procedures to ensure familiarity and compliance with the Commission's CPNI rules.

Pine Belt Telephone Company, Inc.

John Mettles
Its: President/CEO